SEWARD & KISSEL LLP

ONE BATTERY PARK PLAZA
NEW YORK, NEW YORK 10004

TELEPHONE: (212) 574-1200
FACSIMILE: (212) 480-8421
WWW.SEWKIS.COM

BRIAN P. MALONEY
(212) 574-1448
maloney@sewkis.com

901 K STREET, N.W.
WASHINGTON, DC 20005
TELEPHONE: (202) 737-8833
FACSIMILE: (202) 737-5184

March 16, 2021

VIA ECF
Hon. Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

> ## MEMO ENDORSED

Re: *Old Hill Partners Inc. v. Bravery Maritime Corporation*, No. 20 Civ. 10749 (KPF)

Dear Judge Failla:

We represent Plaintiff Old Hill Partners Inc., as Agent and Security Trustee in this action. In light of the failure of Defendant Bravery Maritime Corporation ("Bravery") to respond to this action, we have today filed a proposed certificate of default and plan to move for default judgment against Bravery.

Given Bravery's failure to appear, we respectfully request that the initial conference scheduled for March 25, 2021 at 11:00 a.m. (Dkt. 8) and the Proposed Civil Case Management Plan and Scheduling Order due to be filed by the parties on March 18, 2021 in advance of that conference be adjourned. Pursuant to item 2.D. of the Court's individual rules of practice in civil cases, this is our first request for adjournment of these deadlines. We anticipate filing an order to show cause for default judgment in this action against Bravery by on or about March 30, 2021.

We thank the Court for its consideration.

Respectfully submitted,

Brian P. Maloney

Application GRANTED. The initial pretrial conference scheduled
for March 25, 2021, as well as the deadlines for the parties'
joint letter and Proposed Case Management Plan and Scheduling
Order, are hereby ADJOURNED *sine die*. Defendant is directed to
file its proposed Order to Show Cause and supporting paperwork on
or before March 31, 2021.

Dated: March 17, 2021   SO ORDERED.
            New York, New York

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE